UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

VIA EMAIL

To Addressees Listed in the Enclosure to this Letter

Subject: EPA Response to Natural Resources Defense Council's (NRDC) April 2009 Tetrachlorovinphos Petition

Dear Petitioners:

Enclosed please find the U.S. Environmental Protection Agency's (EPA or the Agency) response to your Petition entitled "Petition to Cancel All Pet Uses for the Pesticide Tetrachlorvinphos," dated April 23, 2009 and submitted by the Natural Resources Defense Council (NRDC) under the Administrative Procedure Act (APA), 5 U.S.C. § 551, et seq. EPA received the Petition, as well as NRDC's April 2009 "Issue Paper" entitled "Poisons on Pets II: Toxic Chemicals in Flea and Tick Collars," on April 24, 2009. In summary, and as related more specifically in the Agency's response, the Petition claimed that:

- EPA failed to consider pet collar exposures in the 2002 revised human health risk assessment underlying the 2006 Reregistration Eligibility Decision (RED) for tetrachlorvinphos (TCVP).
- EPA used faulty exposure assumptions in the 2006 organophosphate cumulative risk assessment.
- The use of TCVP pet collars results in unacceptably high exposures.

Based on those assertions, NRDC's Petition requested that EPA cancel the registrations for all TCVP pet use products. EPA's response to NRDC's Petition is supported by EPA's July 2020 *Tetrachlorvinphos: Revised Residential Exposure and Risk Assessment for the Registered Pet Product Uses* and an addendum to that revised risk assessment *Tetrachlorvinphos: Addendum to the Revised Residential Exposure and Risk Assessment for the Registered Pet Product Uses*.

As fully explained in the enclosed Petition response, the 2020 revised residential exposure and risk assessment shows that all uses associated with TCVP liquid spray pet products result in no risks of concern. The registrants for the remaining registrations for pet use products containing TCVP have agreed to either voluntarily cancel those products or amend those registrations such that revised risk estimates result in no risks of concern. That is, for some TCVP products, voluntary cancellation has been initiated under section 6(f) of FIFRA, and the amendment process has been initiated to resolve risk concerns for all other TCVP pet products. Thus,

cancellation of any TCVP pet product under section 6(b) of FIFRA is not necessary. In the unlikely event that EPA will not be able to grant amendments that remove the risks of concern, EPA will take appropriate regulatory action to address these registrations. Therefore, based on the actions above, NRDC's Petition to cancel all pet uses for TCVP has been denied.

EPA will soon post the enclosed Petition response, to which will be attached the revised risk assessment entitled *Tetrachlorvinphos: Revised Residential Exposure and Risk Assessment for the Registered Pet Product Uses* and the addendum to that revised risk assessment *Tetrachlorvinphos: Addendum to the Revised Residential Exposure and Risk Assessment for the Registered Pet Product Uses*, to the docket for the Petition in regulations.gov (EPA-HQ-OPP-2009-0308). The Agency will also soon post the revised risk assessment and addendum to the TCVP registration review docket in regulations.gov (EPA-HQ-OPP-2008-0316). While EPA has completed the revised residential exposure assessment and addendum in order to expedite the Agency's response to NRDC's Petition, TCVP remains under registration review pursuant to section 3(g) of FIFRA pending completion of a full revised human health risk assessment (including all uses of TCVP) and registration review decision.

If you have further questions regarding this response, please contact Patricia Biggio of my staff, at biggio.patricia@epa.gov or (703) 347-0547.

Sincerely,

Ed Messina, Esq.
Acting Office Director
Office of Pesticide Programs

Enclosures:
List of addressees
Agency Response to "Petition to Cancel All Pet Uses for the Pesticide Tetrachlorvinphos"